

EXHIBIT A

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July 30, 2019

PG&E Chapter 11 Proceedings, No. 19-30088 N.D. Cal

Dear Counsel:

Pacific Gas and Electric Company and PG&E Corporation (together, “**PG&E**” or, the “**Debtors**”), hereby produce the documents contained in PGE-BK-VOL012 and identify the documents referenced below to the Tort Claimants Committee (“**TCC**,” and collectively with PG&E, the “**Parties**”) in response to Exhibit C of the TCC’s April 30, 2019, letter to the Court (“**Exhibit C**”). The Debtors are producing these documents pursuant to the Order Governing Discovery By and Among Debtors, Official Committee of Unsecured Creditors, and Official Committee of Tort Claimants entered by the Court on July 1, 2019. We have attempted to identify the primary Requests to which the documents are responsive.

PGE-BK-VOL012 contains documents responsive to Request 16 of Exhibit C, as negotiated by the Parties and as ordered by the Court in its May 28, 2019 Order. These documents bear Bates numbers PGE-BK-0000039335-PGE-BK-0000039380. PGE-BK-VOL012 is being sent to you by secure FTP, the password for which you will receive contemporaneously with this letter.

PG&E believes that PGE-BK-VOL012 completes its production of responsive, non-privileged documents in response to Exhibit C. PG&E also believes that it has completed of its production of responsive, non-privileged documents within PG&E’s possession in response to Attachment A of the Ex Parte Application of the TCC Pursuant to Bankruptcy Rule 2004 for Orders Authorizing Production of Documents dated April 30, 2019 (“Attachment A”).

As discussed during our Meet and Confer on July 30, 2019, I can confirm that we are endeavoring to identify PG&E’s punitive damages policies that were in effect in 2015 and the policies covering directors and officers for 2016 and we will produce those documents once identified, to the extent they have not already been produced. We are also confirming whether PG&E has certificates of liability insurance or proofs of

coverage for the third party contractors identified in response to Request 25 of Attachment A and whether there are types of insurance, other than general liability insurance, punitive damages insurance and Directors and Officers' insurance, that would cover liability related to the Wildfires.

Regards,

/s/ Monica Kozycz
Monica Kozycz

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